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May 25, 2017

Dave Breninger, retired (PCWA) – Ambassador

John Kingsbury – Executive Director

Randy Forini, Chair  
Delta Stewardship Council Members  
980 Ninth Street, Suite 1500  
SACRAMENTO, CALIFORNIA 95814

Regarding: Public Comments for Delta Plan Amendment  
Agenda Item 10; Conveyance, Storage Systems, and the Operation of Both

Dear Chair Forini,

Thank you for the opportunity to provide comment on the Draft Amendment of  
Delta Plan Revisions for Conveyance, Storage Systems, and the Operation of  
Both (Water Code §85304)

The Mountain Counties Water Resources Association (MCWRA) advocates for  
the water interests of its members in all or a portion of 16 counties from the  
southern tip of Lassen County down to Fresno County. The Mountain Counties  
Area includes ten major watershed areas and accounts for about 25% of all  
natural runoff in California, over half of all snowmelt runoff in the State, and 40%  
of the state's developed water supply, more than from any other single source.  
This total increases to more than 60% of the state's developed water supply  
when combined with other waters from sources within the entire Sierra Nevada.  
The larger Sierra Nevada Region is the source of water for 23 million  
Californians.

The Council is proposing to amend the Delta Plan to promote options for water  
conveyance, storage systems, and the operation of both as required by Water  
Code §85304. The draft Delta Plan CSO amendment includes  
recommendations for Delta water management system operations and  
supporting infrastructure improvements that, together and in combination with  
existing Delta Plan policies and recommendations, will further the coequal  
goals.

To achieve the coequal goals, there needs to be a fundamental change in the way water is managed and water systems are operated in the Delta, its watershed, and all of California.

California's existing integrated and complex water system was built in the 1960s for a different time, hydrology, and population. Climate is and has been warming. By 2050, conservative estimates are that we'll lose 25 to 40 percent of the Sierra snowpack, the state's largest winter reservoir. The population has more than doubled since the state and federal water projects were constructed. In 1960, there were 15.87 million people in California. Now there are estimates of around 36 million people and projections of over 60 million people by the year 2050. California's population is larger than many nations of the world.

Significant to the Delta and California is the water captured and stored in the forest and foothill meadows and ponds, in reservoirs behind dams, and ground water basins. Systems built decades ago, have dedicated in-stream flow releases designed to meet many beneficial uses of the environment, agriculture, and urban and municipal needs and provide downstream flood control benefit. As the planet warms, more precipitation will land in the Sierra Nevadas in the form of rain rather than snow. Rain, not absorbed by the forest floor, moves unimpeded through the watershed, breaching dams, causing valley flooding and pressure on the Delta levee system before the water heads out the Golden Gate.

A critical element missing from the discussion is the science developed by the Delta Independent Science Board (Delta ISB). While there is much talk of more flow for the fish, in August 2015, the Delta ISB reported that "flow is but one factor affecting fishes and its effects are confounded by other drivers of fish production in the ecosystem". The report went on to say "that five major drivers are considered as agents of change in any given ecosystem. These are habitat alteration and loss, resource use and exploitation, invasive species, pollution, and climate. All of these drivers have played a role in the Delta and affected fishes." The report reads "it is almost impossible to assess how flows affected fishes historically in the Delta because the ecosystem has undergone and is still experiencing dramatic alterations in habitat, species composition and interactions, channel morphology, and water quality."

There is much interest to save and enhance endangered species in the Delta. However, that has been little or no regard to the impacts to the endangered aquatic plant and animal species, including endemic and migrating species that are already stressed by forest fires and drought within the Delta secondary zone, the Sierra Nevada. If the Delta is to survive, so must its watershed.

To achieve the Co-Equal goals, it is essential that the State fix the multiple "drivers" in the Delta. Until the "drivers" have been fixed in the Delta to provide food and cover for the endangered fish and water quality issues fixed upstream, more flow should be deemed a waste and unreasonable use of water, particularly when the science is not there.

The State should make a similar commitment to protect the Delta headwaters in the Sierra Nevada mountain range that provides all the source water for the Delta. Climate change and reoccurring drought in the Sierra Nevada will only increase the frequency of catastrophic wildland fires. This will lead to devastating water supply consequences for Delta inflows. Wildland fires in the state's largest natural winter reservoir, the "Sierra Nevada", can decimate the landscape, reduce natural storage, accelerate runoff, change the soil to sediment, and increase flooding only to put further pressure on the State's levee system. This scenario would reduce statewide water supply, degrade water quality, effect hydropower generation, the environment, recreation and tourism. The State can ill afford to wait for a catastrophic forest fire.

There are several proposed well-known surface water storage projects being considered for a portion of the \$2.7 billion-dollar Proposition 1 funding. However, I would like to bring to your attention several potential water storage projects in the Delta watershed that would yield regional and statewide public benefits.

These regional projects include, Alder Reservoir, Blagen Mill Pond Restoration Project, Centennial Reservoir, Herring Creek Reservoir Expansion, Sierra Pines Reservoir, Sugar Pine Dam Raise, Tuolumne County Water Supply Reliability Project, Upper Strawberry Reservoir, and Wilson Lake Rehabilitation and Meadow Restoration Plan, and other new and expanded forestry and meadow restoration projects that will help sequester water for later downstream benefit.

These water storage projects will help reduce ground water extraction and subsidence in the Delta by using surface water during wet years and the ground water basin during dry years. Additional storage in this region will provide a buffer for new urban and municipal uses, drought preparedness, downstream flood protection, and provide additional cold water for endangered fish. The water released from these reservoirs will help balance the wind and solar electricity grid by generating carbon-free renewable hydropower energy. Please also keep in mind that there is no better opportunity to develop clean renewable hydropower energy than in the Mountain Counties Area.

The Delta Reform Act of 2009 established the Delta Stewardship Council to further achieve the coequal goals as defined in the Act. It is time to increase the state's ability to capture and sequester the millions of gallons of fresh water that could later provide for many local, regional, and statewide beneficial uses.

Sincerely,

A handwritten signature in blue ink, appearing to read 'John Kingsbury', with a stylized, flowing script.

John Kingsbury  
Executive Director  
Mountain Counties Water Resources Association

C: Board of Directors, Mountain Counties Water Resources Association  
Delta Stewardship Council Members  
Jessica Pearson, Executive Officer